

# Exhibit G

## Tram Nguyen

---

**From:** Michelle Parfitt  
**Sent:** Tuesday, September 08, 2020 1:00 PM  
**To:** Tram Nguyen  
**Cc:** Michelle Parfitt  
**Subject:** Fwd: Plaintiffs Profile Forms submitted through MDL Centrality

**Michelle A. Parfitt**  
Senior Partner

Ashcraft & Gerel, LLP  
1825 K Street NW, Suite 700  
Washington, DC 20006  
Office: 202.783.6400  
Mobile: 202.669.0032  
Fax: 202.416.6392  
[mparfitt@ashcraftlaw.com](mailto:mparfitt@ashcraftlaw.com)



Begin forwarded message:

**From:** "Sharko, Susan M" <[susan.sharko@faegredrinker.com](mailto:susan.sharko@faegredrinker.com)>  
**Subject:** RE: Plaintiffs Profile Forms submitted through MDL Centrality  
**Date:** September 3, 2020 at 2:26:07 PM EDT  
**To:** Michelle Parfitt <[MParfitt@ashcraftlaw.com](mailto:MParfitt@ashcraftlaw.com)>  
**Cc:** Leigh O'Dell <[Leigh.ODell@beasleyallen.com](mailto:Leigh.ODell@beasleyallen.com)>, Sindhu Daniel  
<[sdaniel@baronbudd.com](mailto:sdaniel@baronbudd.com)>

Thanks. We will hold off until Monday filing a motion to dismiss with prejudice for failure to comply with the order but expect you all to use the extra time to make this unnecessary. Appreciate your anticipated help. Susan

---

**From:** Michelle Parfitt <[MParfitt@ashcraftlaw.com](mailto:MParfitt@ashcraftlaw.com)>  
**Sent:** Thursday, September 3, 2020 10:22 AM  
**To:** Sharko, Susan M <[susan.sharko@faegredrinker.com](mailto:susan.sharko@faegredrinker.com)>  
**Cc:** Leigh O'Dell <[Leigh.ODell@beasleyallen.com](mailto:Leigh.ODell@beasleyallen.com)>; Sindhu Daniel <[sdaniel@baronbudd.com](mailto:sdaniel@baronbudd.com)>  
**Subject:** Re: Plaintiffs Profile Forms submitted through MDL Centrality

**This Message originated outside your organization.**

---

Susan, Good morning. Yes it has been busy for quite some time and yes we were doing our very best as leadership to get these PPFs to you as efficiently as we could. We are confident that we ushered these forms to JJ with the best of intentions and efforts. You received 925 PPF on September 2. All we are asking is to give us until Friday to reconcile the status of the 49 cases that were not submitted. A fair and considered ask and it will not prejudice JJ.

I suspect in the time it takes us to bring this "ask" to the Court we will have a fulsome explanation to provide to JJ regarding the 49 claims not submitted. We plan to speak to the firms that represent the 49 claimants today and are optimistic that we will have a clearer explanation. We learned the final count at midnight when I shared the count with you.

In the past our discussions seem to resolve these issues. We are more than happy to get on the phone if you believe that would allow us to address this issue to everyone's satisfaction.

Regards,  
Michelle

**Michelle A. Parfitt**  
Senior Partner

Ashcraft & Gerel, LLP  
1825 K Street NW, Suite 700  
Washington, DC 20006  
Office: 202.783.6400  
Mobile: 202.669.0032  
Fax: 202.416.6392  
[mparfitt@ashcraftlaw.com](mailto:mparfitt@ashcraftlaw.com)



On Sep 3, 2020, at 9:26 AM, Sharko, Susan M <[susan.sharko@faegredrinker.com](mailto:susan.sharko@faegredrinker.com)> wrote:

You all obviously had a late night. Not sure what you are asking here. It was quite disappointing to see that the majority of the fact sheets didn't come in until the last day, compressing our review time. You will see that our notices, going out today, provide a short grace period to enable plaintiffs to correct their deficiencies. Given the schedule in place, we do not agree to do nothing until Friday as that would prejudice our review. Thanks. Susan.

---

**From:** Michelle Parfitt <[MParfitt@ashcraftlaw.com](mailto:MParfitt@ashcraftlaw.com)>

**Sent:** Thursday, September 3, 2020 12:09 AM

**To:** Sharko, Susan M <[susan.sharko@faegredrinker.com](mailto:susan.sharko@faegredrinker.com)>

**Cc:** [Leigh.ODell@beasleyallen.com](mailto:Leigh.ODell@beasleyallen.com); Sindhu Daniel <[sdaniel@baronbudd.com](mailto:sdaniel@baronbudd.com)>; Michelle Parfitt <[MParfitt@ashcraftlaw.com](mailto:MParfitt@ashcraftlaw.com)>

**Subject:** Plaintiffs Profile Forms submitted through MDL Centrality

**This Message originated outside your organization.**

---

Good evening Susan,

Our records reflect that as of this evening 925 Plaintiff Profile Forms (PPF) have been uploaded and submitted to JJ through MDL Centrality. It appears that there are 15

Dismissals and 49 cases that have not been submitted or served. There could be many reasons for this discrepancy, including issues with data entry, duplicate cases, or that cases have been voluntarily dismissed. We would like to take the opportunity tomorrow to reconcile the remaining cases with the representative firms and confirm which cases remain after any pending voluntary dismissals, duplication issues or data entry errors. We trust that you will agree to provide us with the opportunity to perform the reconciliation and address any issues by Friday, September 4th, as this will not prejudice JJ's review.

Kind regards,  
Michelle, Leigh & Sindhu

**Michelle A. Parfitt**  
Senior Partner

Ashcraft & Gerel, LLP  
1825 K Street NW, Suite 700  
Washington, DC 20006  
Office: 202.783.6400  
Mobile: 202.669.0032  
Fax: 202.416.6392  
[mparfitt@ashcraftlaw.com](mailto:mparfitt@ashcraftlaw.com)

CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, may contain confidential and privileged information, either as protected attorney work product or confidential client information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.